

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

Report Date: November 17, 2005

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Mohave Cellular Limited Partnership d/b/a Citizens Mohave Cellular and d/b/a Mohave Wireless ("Mohave Wireless") seeks to avail itself of the temporary relief granted to TDMA carriers through September 18, 2006, as set forth in *Order on Reconsideration and Further Notice of Proposed Rulemaking*, WT Docket No. 01-309, FCC 05-122, released June 21, 2005, and codified in amended FCC Rule Section 20.19(c)(2)(i). Mohave Wireless is eligible for TDMA relief because it has conducted a complete overbuild of its entire TDMA network before September 18, 2006. In fact, Mohave Wireless completed its CDMA overbuild on April 29, 2004. Mohave Wireless offers four hearing aid-compatible handset models to customers that receive service from the overbuilt (*i.e.*, CDMA) portion of the network, and Mohave Wireless makes available in each retail store it owns or operates these handset models for consumers to test in the store.

(1) Digital wireless phones tested: Mohave Wireless operates a CDMA cellular system as well as an underlying, legacy TDMA network. Mohave Wireless acquires digital wireless telephone handsets manufactured by Motorola, Kyocera and LG

(collectively, “Vendors”). Mohave Wireless obtains from Motorola a set of three hearing aid compatible (HAC) handsets rated M3 under standard ANSI C63.19-2005 (“Compliant Phones”). The models tested are V262, V265 and V710. Mohave Wireless obtains from Nokia one Compliant Phone. The model tested is 6015i. Vendors of TDMA handsets are not offering any Compliant Phones.

(2) Laboratory used: Mohave Wireless does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. Mohave Wireless relies upon its Vendors to conduct testing and to confirm the compliance of each specific handset device.

(3) Test results for each phone tested: The Compliant Phones deployed by Mohave Wireless have tested positively for M3 compliance.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: Of the handsets offered by Mohave Wireless, Motorola models V262, V265 and V710, and Nokia model 6015i are rated M3 under standard ANSI C63.19-2005.

(5) Status of product labeling: Mohave Wireless typically relies upon its Vendors to label all products prior to their shipment to Mohave Wireless’ retail locations. The Compliant Phones offered by Mohave Wireless contain M3 product labeling and additional information.

(6) Outreach efforts: Now that Compliant Phones have become available they will be publicly identified for consumers and audiologists. Mohave Wireless’ Compliant Phones are listed on Mohave Wireless’ web site, and the information is available to consumer groups. Mohave Wireless trains its retail salespeople regarding which of the digital wireless phones offered are Compliant Phones. Written materials, pamphlets and other promotional literature are provided at the point of sale, addressing the needs of individuals with hearing disabilities. Mohave Wireless conducts a consumer education program aimed at reaching hearing aid and cochlear implant users. Consumers are given a 30-day trial period within which to try out the digital wireless phone to determine whether they will work properly with their hearing aids. Flexible exchange and return policies apply to consumers seeking to obtain a Compliant Phone. Toward this end, Mohave Wireless has specifically instructed its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users. Additionally, Mohave Wireless conducts outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services. Current technical and anecdotal information is made available to the public regarding the hearing aid compatibility of Mohave Wireless’ Compliant Phones in the form of handouts from Motorola and Nokia that are distributed at retail centers and in all communications with the hearing disabilities community.

(7) Retail availability of compliant phones: The Compliant Phones offered by Mohave Wireless are presently available in Mohave Wireless' retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: Mohave Wireless is in contact with its Vendors with regard to their incorporation of HAC features into future CDMA phones. Mohave Wireless is following its Vendors' efforts to provide additional new handsets that will be hearing aid-compatible. Mohave Wireless plans to add to its assortment of Compliant Phones as new models achieve M3 and M3T ratings.

(9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: Mohave Wireless is aware that its Vendors are undertaking to comply with the FCC's requirements to provide Compliant Phones. Mohave Wireless is ready and willing to offer new or additional compliant devices to interested customers, and will encourage its Vendors to expedite the availability of advanced handset devices, including handsets rated M3T under standard ANSI C63.19-2005.

(10) Number of compliant and non-compliant phone models offered at this time: Mohave Wireless' core assortment presently includes six models of CDMA handsets. Four of these are Compliant Phones. No TDMA handsets are offered.

(11) Differences in handset offerings among regions in service areas, if any: There are no differences in handset offerings among regions in Mohave Wireless' service area. Mohave Wireless' handset offerings are presently consistent in all parts of its market.

(12) Ongoing efforts for interoperability testing with hearing aid devices: Mohave Wireless will rely mainly upon its Vendors to conduct interoperability testing of Compliant Phones, and will provide to consumers information about those efforts upon request.